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**VIA ECF**

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Hon. Louis L. Stanton, United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Broadcast Music, Inc. v. Pandora Media, Inc.*, No. 13-CIV-4037 (LLS)

Dear Judge Stanton:

On October 6, we wrote to the Court on behalf of Pandora Media, Inc. to join BMI's request for a pre-motion conference to address BMI's request to modify the Protective Order. We also indicated that it was likely that we would be submitting an additional letter requesting a pre-motion conference to address unrelated additional matters. Undersigned counsel met and conferred with counsel for BMI by telephone on October 7. At the conclusion of that telephone call, BMI's counsel stated that counsel would consider the issues we raised and get back to us promptly. BMI counsel did not indicate on the call whether BMI would oppose Pandora's anticipated motion. We followed up with BMI counsel yesterday, October 9, and again today, and were advised this afternoon that BMI's counsel is away on religious leave and will not be able to respond until Monday, October 13. Assuming BMI opposes Pandora's requested relief, Pandora intends to file its letter requesting a pre-motion conference on Tuesday, October 14. In that letter, we will request that the Court convene a pre-motion conference to address both BMI's and Pandora's motion requests at its earliest convenience.

Respectfully submitted,

/s/ Kenneth L. Steinthal  
Kenneth L. Steinthal

cc: All Counsel